

**FARRIS MATHEWS BRANAN  
BOBANGO & HELLEN, PLC**

ATTORNEYS AT LAW

HISTORIC CASTNER-KNOTT BUILDING  
618 CHURCH STREET, SUITE 300  
NASHVILLE, TENNESSEE 37219

Telephone: (615) 726-1200

Facsimile: (615) 726-1776

Charles B. Welch, Jr.  
cwelch@farrismathews.com

Writers Direct Dial:  
615-687-4230

June 5, 2002

**VIA HAND DELIVERY**

Mr. K. David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: In the Matter of Petition of Tennessee UNE-P Coalition to Open Contested Case  
Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network  
Element  
Docket No. 02-00207

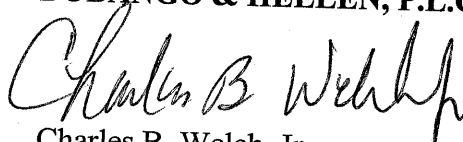
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Objections of Business Telecom, Inc. to First Set of Discovery Requests of BellSouth Telecommunications in the referenced docket. Copies have been served upon all parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**



Charles B. Welch, Jr.

CBW:lw  
Enclosures

**FARRIS MATHEWS BRANAN  
BOBANGO & HELLEN, PLC**

ATTORNEYS AT LAW

HISTORIC CASTNER-KNOTT BUILDING  
618 CHURCH STREET, SUITE 300  
NASHVILLE, TENNESSEE 37219

Charles B. Welch, Jr.  
cwelch@farrismathews.com

Telephone: (615) 726-1200  
Facsimile: (615) 726-1776

Writers Direct Dial:  
615-687-4230

June 5, 2002

Guy M. Hicks, Esq.  
Joelle J. Phillips, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

Re: In the Matter of Petition of Tennessee UNE-P Coalition to Open Contested Case  
Proceeding to Declare Unbundled Switching An Unrestricted Unbundled Network  
Element  
Docket No. 02-00207  
BellSouth Telecommunication, Inc.'s First Set of Discovery Requests to Business  
Telecom, Inc.

Dear Counsel:

As counsel for Business Telecom, Inc., I am hereby objecting to BellSouth Telecommunication, Inc.'s First Set of Discovery Requests which were mailed to Mr. Anthony Copeland on May 24, 2002.

Business Telecom, Inc. is not a party to this proceeding and the service of these discovery requests do not conform to any rules of procedure. Furthermore, the information is proprietary and it would be unduly burdensome for my client to accumulate and present this evidence to you in this forum.

While I am copying my response to you to the Tennessee Regulatory Authority, this should not be construed as an appearance which my client is entering in this matter.

If you are going to subject my client to the time and expense of participating in a hearing which they have not consented to participate in, then we will require that strict compliance with all rules of procedure be adhered to.

MEMPHIS DOWNTOWN: One Commerce Square, Suite 2000, Memphis, Tennessee 38103, (901) 259-7100 telephone, (901) 259-7150 facsimile

MEMPHIS EAST: 1100 Ridgeway Loop Road, Suite 400, Memphis, Tennessee 38120, (901)259-7120 telephone, (901)259-7180 facsimile

June 5, 2002  
Page 2

Very truly yours,

**FARRIS, MATHEWS, BRANAN,  
BOBANGO & HELLEN, P.L.C.**

A handwritten signature in cursive script, appearing to read "Charles B. Welch, Jr.", written in dark ink.

Charles B. Welch, Jr.

CBW:lw